

UNITED STATES DISTRICT COURT  
DISTRICT OF DELAWARE

NO LABELS,

Plaintiff,

v.

NOLABELS.COM INC.,

Defendant.

Case No. 1:23-cv-01384-GBW

**DECLARATION OF LIZ MORRISON**

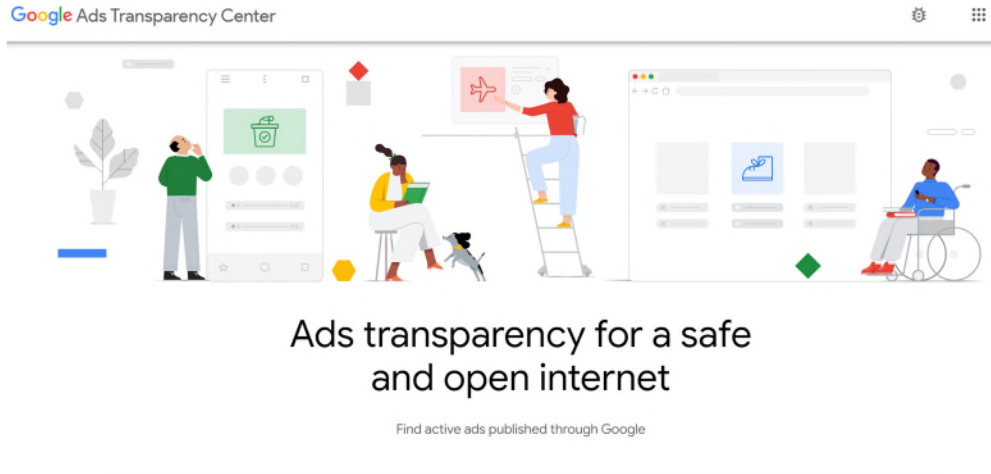
I, Liz Morrison, do hereby declare and state the following based on first-hand knowledge:

1. I am a Co-Executive Director at No Labels. I have a bachelor's degree from the College of William & Mary.


2. I submit this declaration in further support of Plaintiff's Motion for Temporary Restraining Order and/or Motion for Preliminary Injunction based on my information, knowledge and belief and the records in this matter.

3. If called as a witness, I could and would testify competently to the information detailed in this declaration.

4. On Thursday, December 14, 2023, I visited the website for the Google Ads Transparency Center located at <https://adstransparency.google.com/>, which provides the ability to search for advertisers and proclaims: "Ads transparency for a safe and open internet: Find active ads published through Google." See Dec. 14, 2023 screenshot below.



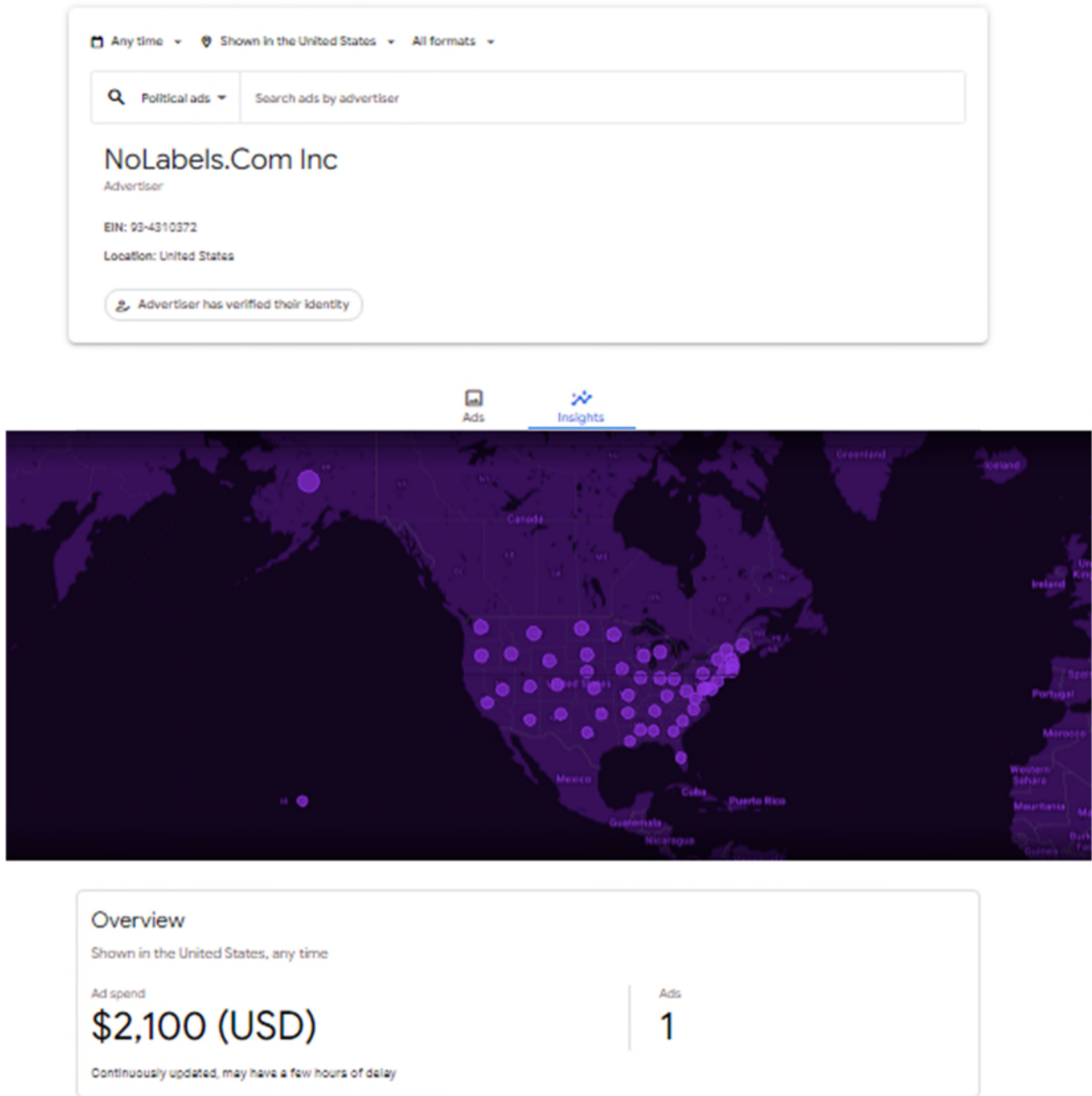
5. On the search bar, I entered the phrase “NoLabels.com Inc.” and the result was advertising information for NoLabels.com Inc.’s purchase of advertisement labeled as a political ad. *See* Dec. 14, 2023 screenshot below. On that same page, the site provides the following information: (1) Shown 2K – 3K times; (2) From Nov 23 – Dec 14, 2023 (20 days); (3) Spent \$2K - \$2.5K.

**Sponsored**  
Paid for by **NoLabels.Com Inc**  
 **nolabels.com**  
[www.nolabels.com/](http://www.nolabels.com/)  
**Standing up for America - Join NoLabels.com community**  

We are Problem Solvers, embodying resilience and courage, advocating for the right causes. Elevating NoLabels.com candidates and Americans disillusioned with current politics.

**NoLabels.Com Inc**  
Shown **2K – 3K** times  
From **Nov 23 – Dec 14, 2023** (20 days)  
Spent **\$2K - \$2.5K**

6. Next, and within that same site, I clicked on the “Insights” tab, which revealed that the ad purchased by NoLabels.com Inc had been “shown” in all fifty states and the District of Columbia totaling \$2,100. *See* Dec. 14, 2023 screenshot below.



7. Separately, No Labels in or around 2018, inadvertently allowed its registration of the < nolabels.com> domain to lapse, a registration that it had held since approximately 2009.

8. Upon realizing this inadvertent lapse, at various times in Fall 2023, No Labels attempted to repurchase the <nolabels.com> domain, including through a third-party vendor that approached the registrant with multiple offers. See Attachment A, Nov. 27, 2023 email correspondence with Name Ninja.

9. No Labels never received any response to any of its offers. See id.

10. I declare under penalty of perjury as provided by law that the statements contained in this declaration are true and correct to the best of my knowledge and belief.

EXECUTED this 14, day of December, 2023.



Liz Morrison

# **ATTACHMENT A**

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**From:** Michelle Penninger [REDACTED]  
**Sent:** Monday, November 27, 2023 10:00 AM  
**To:** Sam Fulton [REDACTED]; Nancy Jacobson [REDACTED]; Liz Morrison [REDACTED]; Shaya Blanc [REDACTED]; McKinley Mason Scholtz [REDACTED]  
**Cc:** Bill Sweetman [REDACTED]; Jeanette Lalonde [REDACTED]; Natasha Nel [REDACTED]  
**Subject:** Update: NoLabels.com ~ November 27, 2023

Hello Nancy and team,

Happiest of Mondays to you!

It is time for our weekly email update on the NoLabels.com project.

Over the course of the last week:

- \* Name Ninja continued to stay in close contact with the marketplace contact to see if they can help us to provoke a response from the domain name owner. The owner never did respond.
- \* Our contact at the domain name marketplace sent a Best and Final Offer to the domain name owner. The owner never responded to that, either.
- \* On Saturday, you and Bill discussed the alarming fact that the mystery owner had just launched a Website using the domain. Bill provided you with some contextual notes and recommended that you engage with a lawyer to file a lawsuit or UDRP since this has now become a legal matter as the domain owner is clearly trying to interfere with your organization's work.

NEXT STEPS: Name Ninja is going to stand down while you explore the legal route. We will, of course, let you know if the mystery domain owner responds to our previous inquiries and offers, although we doubt they will.

Please let us know if you have any questions. Depending on how things go this week, we may send another regular weekly update next week at this same time. If we have any "breaking news" to share we will right away.

Thank you!

Michelle



**Michelle Penninger** / Senior Ninja  
[REDACTED] / she/her

**Name Ninja**  
416-203-7033 Ext. 205  
Toronto, Canada  
<http://www.nameninja.com>

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Michelle Penninger

November 27, 2023 10:00 AM

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Thank you!

Michelle



**Michelle Penninger** / Senior Ninja  
[REDACTED] / she/her

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416-203-7033 Ext. 205  
Toronto, Canada  
<http://www.nameninja.com>



**Bill Sweetman** / President  
[REDACTED] / he/him

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